

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AXIOM INVESTMENT ADVISORS, LLC, by
and through its Trustee, Gildor Management,
LLC, and AXIOM INVESTMENT
COMPANY, LLC, by and through its Trustee,
Gildor Management, LLC,

Case No. 15-cv-09945 (LGS)

Plaintiffs,

vs.

DEUTSCHE BANK AG,

Defendant.

**DECLARATION OF RANDALL P. EWING IN SUPPORT OF
PLAINTIFF'S MOTION FOR CLASS CERTIFICATION PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 23**

Randall P. Ewing declares:

1. I am a partner at Korein Tillery, LLC, and I am one of the attorneys principally responsible for the handling of this matter. I submit this declaration in support of Plaintiffs' Motion for Class Certification Pursuant to Federal Rule of Civil Procedure 23. I am personally familiar with the facts set forth in this declaration. If called as a witness, I could and would competently testify to the matters stated herein.
2. Attached as Exhibit 8 to this declaration, and pursuant to Rule of Evidence 1006, is a summary chart that contains true and accurate excerpts of relevant portions of contracts or agreements produced in this case.

3. Attached as Exhibits are true and accurate excerpts of transcripts from depositions taken in this case. They consist of:

Deponent Name	Citation	Exhibit
David Leigh	35:6-36:7, 37:15-24, 64:13-17, 64:18-25, 65:1-15, 69:12-19, 74, 74:1-5, 75:25-76:2,	2
Maria Prata	34:24-35:8, 35:5-8, 44:5-12, 53:19-54:5, 73:3-9, 91:16-92:4, 153:20-154:5, 179-180, 179:25-180:16, 182:3- 13, 186:11-23, 187:7- 19, 251:11-252:22	3
Ian O'Flaherty	35:18-23, 37:1-10, 96:25- 97:9, 97:10-25 106:9- 10, 133:8-12, 153:9- 154:12	7
Roel Oomen	38:5-6;11-15, 78:3-4;14- 16, 150:25-151:3, 151:9- 13, 152:15-18, 154:16- 155:10, 155:12-156:11, 161:10-14, 249:1-251:17	10
Aleksander Ivic	59:7-60:5, 113:15-114:4, 118:10-119:19	12
Philip Wood	34:5-35:13, 37:5-37:20, 102:4-102:8	21
Ephraim Gildor	115:9-117:25, 117:10- 14, 123:3-126:10, 135:23-137:8, 309:19- 312:25, 328:14-329:9, 336:6-25, 355:18-357:2	24
George Kirchgaesser	292:4-25	25

4. Attached as Exhibits are true and accurate excerpts of documents produced in this case. They consist of:

Bates ID	Exhibit
DB-Axiom_01241496	1
DB-Axiom_01913539	4
DB-Axiom_0236548	5
DB-Axiom_01469972	6
DB-Axiom_01279897	9
DB-Axiom_01314378	11
DB-Axiom_00910034	13
DB-Axiom_01726366	14
DB-Axiom_02285379	15
DB-Axiom_02405310	16
DB-Axiom_02419337	17
DB-Axiom_01205241	18
DB-Axiom_01657651	19
DB-Axiom_01314483	20
DB-Axiom_01621455	23
DB-Axiom_019052	26

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 15, 2018 in Chicago, Illinois.



Randall P. Ewing